Please accept these comments in reference to NPRM 05-235

97.1 Basis and propose.

The rules and regulations in this Part are designed to provide an amateur radio service having a fundamental purpose as expressed in the following principles:

(a) Recognition and enhancement of the value of the amateur service to the public as a voluntary noncommercial communication service, particularly with respect to providing emergency communications.

No one is disputing the fact the Morse code transmissions are more spectrum efficient and have a proven ability to supply a communications channel with a minimum amount of equipment when other modes are not usable. Morse code is a skill that must be acquired and maintained through use and practice. It is in the public interest to have some certified level of proficiency in Morse code at some level in the Amateur service.

(b) Continuation and extension of the amateur's proven ability to contribute to the advancement of the radio art.

Most electronic experimenting being done in the Amateur service is with low power transmitting circuits and simple receivers. A wealth of information and insight into radio phenomena can be gained by experimenting with these circuits. To reduce the complexity, Morse code is the modulation method of choice for most of these transmitters. To be able to use these units on the air, the Amateur operator must have some proficiency in Morse code. It would serve the public interest if this proficiency were certified through some level of testing in the Amateur service.

(c) Encouragement and improvement of the amateur service through rules which provide for advancing skills in both the communications and technical phases of the art.

Morse code is a skill that has proven useful throughout the history of Amateur radio. Although Morse code is not a new high tech mode and is, in fact, from the dawn of radio history does not mean that it is not a useful skill to acquire. The public interest would be served by certifying this skill through testing in the Amateur service.

(d) Expansion of the existing reservoir within the amateur radio service of trained operators, technicians, and electronics experts.

It is true that many services have eliminated their requirement to employ personnel with Morse code skills. But a search of the federal employment web sites lists employment opportunities for both civilian and military personnel with Morse code skills. It is in the public interest to allow the Amateur service to foster the development these required Morse code skills and certify that proficiency.

(e) Continuation and extension of the amateur's unique ability to enhance international goodwill.

Through the use of standard codes and abbreviations it is possible for Amateurs who are lacking a common language to convey useful information via Morse code. The ability of the members of the Amateur service to act as goodwill ambassadors is expanded by use of Morse code that they have in common with Amateurs of other countries.
Although other governments have decided that it is their best interest to eliminate testing requirements for Morse code, not all governments have decided to forgo testing for some Morse code proficiency. Many of those governments that are still testing for proficiency in Morse code also have reciprocal license agreements with our government. Without certified proficiency in Morse code, our Amateurs will have to settle for a lower class license when they apply for a reciprocal license in countries that still have a Morse code requirement. To allow our Amateurs to be full participants in other countries Amateur activities, it is in the public interest to certify some level of Morse code proficiency in the Amateur service.

I wish the commission would reconsider its decision to eliminate element 1 testing for licensing in the Amateur radio service. For the above reasons I feel that keeping the Morse code test is in the public interest for at least the Amateur Extra class license if not the General Class license too.
I also would like the commission to reevaluate the decision not to add an entry class license to the Amateur radio service. Over the last few years I have taught both Technician and General classes. During these classes, specifically the Technician class, I have seen younger students struggle with some of the math and some of the concepts such as RF safety. Matter of fact, these younger students had less trouble mastering element 1 than some of the material presented in the Technician study guide. Most of the people commenting on this NPRM are stating that if this hobby is going to survive then we must attract younger people into the Amateur service. My experience, as far as the younger generation is concerned, is removal of element 1 is not the answer but, in fact, offering a test that is within their capabilities and granting access to Amateur spectrum commiserate with level of study. The ARRL among others submitted viable proposals for just such an entry-level license.
If this NPRM leads to a Report and Order, I would urge the commission to also include NPRM 04-140 in that Report and Order. With the large number of requests for change included in NPRM 04-140 and NPRM 05-235 the Amateur service has been in state of uncertainty for far to long. With both NPRM 04-140 and NPRM 05-235 completed in an appropriate Report and Order Hopefully a degree of stability will be achieved in the Amateur service regulations.

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